

**DECLARATION OF M. CARTER CROW**

“I, M. Carter Crow, under penalty of perjury, hereby declare as follows:

1. My name is M. Carter Crow. I am over eighteen years of age, of sound mind, and am competent in all respects to make this declaration.

2. I am an attorney at law in good standing and duly licensed to practice before all courts of the state of Texas, including the U.S. District Court, Western District of Texas. I am a partner with the law firm of Norton Rose Fulbright US LLP. EOG Resources, Inc. has retained my firm for the case. I am one of the lawyers primarily responsible for defense of this case. I make the statements in this declaration based on my personal knowledge.

**Deposition Testimony:**

3. I took the deposition of Plaintiff Jevan Snead on September 11, 2017. Based on my attendance at that deposition and review of the certified transcript, I declare that true and correct excerpts of Snead’s deposition transcript are attached as Exhibit B.

4. I defended and attended the deposition of Bobby Sanders on September 14, 2017. Based on my attendance at that deposition and review of the certified transcript, I declare that true and correct excerpts of Sanders’s deposition transcript are attached as Exhibit F.

5. I defended and attended the deposition of Jake Morrison on September 15, 2017. Based on my attendance at that deposition and review of the certified transcript, I declare that true and correct excerpts of Morrison’s deposition transcript are attached as Exhibit I.

6. I defended and attended the deposition of Gordon Goodman on October 17, 2017. Based on my attendance at that deposition and review of the certified transcript, I declare that true and correct excerpts of Goodman’s deposition transcript are attached as Exhibit U.

**Documentary Evidence as Deposition Exhibits at Plaintiff’s Deposition:**

7. Attached as Exhibit C are true and correct copies of Deposition Exhibits 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, and 22 (EOG 013471—013491), which are Instagram Posts of Snead, and excerpts from Deposition Exhibit 8, which are Snead’s invoices to EOG. Attached as

Exhibit C-1 are a true and correct copy of the Instagram Posts that were produced in discovery and that were Deposition Exhibits 10—22 but which contain a more clear view of the date.

8. Attached as Exhibit D are true and correct copies of Deposition Exhibit 17 (EOG 013482), which is a specific Instagram Post dated September 11, 2015, and an excerpt from Deposition Exhibit 8, which is a specific invoice dated 8/31/2015—9/13/2015 that Snead submitted to EOG.

9. Attached as Exhibit E are true and correct copies of Deposition Exhibit 20 (EOG 013486), which is a specific Instagram Post dated October 10, 2015, and an excerpt from Deposition Exhibit 8, which is a specific invoice dated 9/28/2015—10/11/2015 that Snead submitted to EOG.

10. Attached as Exhibit K are true and correct copies of Deposition Exhibit 8 (EOG 000059—EOG 000127), which are Snead's invoices submitted to EOG. Attached as Exhibit P is a true and correct copy of a chart that summarizes the minimum amount paid each week to Snead based on Deposition Exhibit 8. This chart was created in Response to Snead's Motion for Partial Summary Judgment (Doc. 39) and is a summary of voluminous writings that EOG has prepared, pursuant to Federal Rule of Evidence 1006.

11. Attached as Exhibit M is a true and correct copy of Deposition Exhibit 23 (Snead 1250-1272), which is Snead's 2014 Federal Tax Return. This exhibit is being filed under seal.

12. Attached as Exhibit N is a true and correct copy of Deposition Exhibit 27 (Snead 0019-0020), which an email dated January 21, 2015 regarding Snead's 7-day schedule.

13. Attached as Exhibit O are true and correct copies of an excerpt from Deposition Exhibit 8, which is a specific invoice dated 6/22/2015—7/5/2015 and 7/6/2015—7/19/2015.

14. Attached as Exhibit Q are true and correct copies of Deposition Exhibit 9, which are calendars summarizing Snead's invoices and which are a summary of voluminous writings that EOG has prepared, pursuant to Federal Rule of Evidence 1006.

15. Attached as Exhibit R are true and correct copies of Deposition Exhibits 2 and 4 (EOG 000132—000157; EOG 000164—000189), which are Snead's December 2013 and October 2015 Master Services Agreements with EOG.

16. Attached as Exhibit S are true and correct copies of excerpts from Deposition Exhibits 5 and 6 (EOG 000161; EOG 000162), which are Independent Contractor Agreements that Snead signed in March 2015.

17. Attached as Exhibit T are true and correct copies of excerpts from Deposition Exhibits 5 and 6 (EOG 000193; EOG 000190), which are Independent Contractor Agreements that Snead signed in October 2015.

**Documentary Evidence Produced During Discovery**

18. Attached as Exhibit G is a true and correct copy of the Declaration of Dennis Sissell (EOG 013703—013705), which was produced to Snead during discovery.

19. Attached as Exhibit H is a true and correct copy of the Declaration of Robert Hunt (EOG 013711—013713), which was produced to Snead during discovery.

20. Attached as Exhibit J is a true and correct copy of the Declaration of Monty Daniel (EOG 013706—013710), which was produced to Snead during discovery.

21. Attached as Exhibit L is a true and correct copy of EOG's Answers to Snead's First Set of Interrogatories, which was produced to Snead during discovery.

22. Attached as Exhibit V is a true and correct copy of EOG's Answers to Snead's Second Set of Interrogatories, which was produced to Snead during discovery.

23. I declare under penalty of perjury that the foregoing is true and correct."

Executed on January 19, 2018

A handwritten signature in dark ink, appearing to read 'M. Carter Crow', is written over a horizontal line.

M. Carter Crow